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November 19, 2014

**Via ECF**

The Honorable Steven I. Locke  
United States Magistrate Judge  
United States District Court for the Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722-9014

Re: **Berlin, et al. v. Maxi-Aids, Inc., et al., 2:14-cv-3028-SJF-SIL, E.D.N.Y.**  
MCB File No. 07562-083968

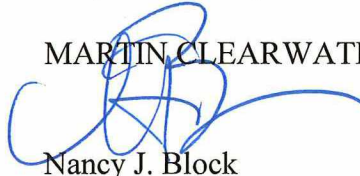
Dear Judge Locke:

Our firm represents Jeremy Tiergman, PSY.D in the above action. We write to join in the request made by Mound Cotton Wollan & Greengrass, on November 14, 2014, and other defendants seeking that the November 25, 2014 conference be cancelled and that discovery be stayed.

As they note in their letter, Dr. Tiegerman recently filed a motion to dismiss; and other co-defendants also anticipate filing a motion to dismiss. Accordingly, we respectfully request that the conference scheduled for November 25, 2014 be cancelled and discovery stayed pending the determination of the motions to dismiss in this action.

Very truly yours,

MARTIN CLEARWATER & BELL LLP



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cc: **Via Regular Mail**

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